

February 8, 2016

BY ECF

The Hon. Richard M. Berman
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl St., Courtroom 17B
New York, NY 10007

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United States v. Evgeny Buryakov, 15 Cr. 73 (RMB)

Dear Judge Berman:

We are counsel to Defendant Evgeny Buryakov. We write to ask the Court to authorize a modification of the Protective Order in this case [Dkt. No. 21] so that certain personal photographs can be returned to Mr. Buryakov's family. We provided the Government with a copy of these photographs and the Government consented to this request. (Mindful of the Court's time and resources, we have not included a copy of these photographs, but should Your Honor wish to review them we would be happy to provide the Court with copies.) Additionally, we respectfully propose to clear any additional personal photographs for exemption from the Protective Order with the Government, without the need for further review or endorsement by the Court.

Accordingly, we respectfully request that the Court exempt from the Protective Order (i) the personal photographs previously identified and consented to by the Government and (ii) any future personal photographs that are cleared by the Government. The Government has consented to this request.

Respectfully submitted,



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